

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

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FILED

06-15-07
04:59 PM

Order Instituting Rulemaking to Consider the)
Adoption of a General Order and Procedures to)
Implement the Digital Infrastructure and Video) Rulemaking 06-10-005
Competition Act of 2006.)

**REPLY COMMENTS OF VERIZON¹ ON ISSUES SET FORTH IN
PHASE II SCOPING MEMO DATED MAY 7, 2007**

Verizon respectfully submits these comments in response to the opening comments filed in this proceeding. These reply comments are limited to the issue of whether additional video and broadband reporting is needed to enforce the Digital Infrastructure and Video Competition Act of 2006 (DIVCA). Most of the comments recommend additional reporting or actions that are either outside the scope of this phase of the proceeding (having been rejected in Phase I of this proceeding) or beyond the jurisdiction of the Commission to perform, or both. Therefore, they should be rejected.

A. Video Subscribership and Pricing Information Is Not Required

The Division of Ratepayer Advocates (DRA) seeks video and cable *subscribership* information by census tract, something not required by DIVCA.² Although DRA asserts that video subscribership data will provide the Commission with “an additional metric to monitor build-outs and service area accessibility,”³ it fails to explain why the existing DIVCA requirement to report

¹ These comments are submitted on behalf of Verizon California Inc. in its capacity as holder of California Video Franchise Certificate Number 0001 dated March 8, 2007.

² DRA at 3.

³ DRA at 4.

video *availability* data does not amply serve that purpose. More to the point, it fails to explain how video subscribership data has *any* relevance to DIVCA's build-out requirements. Build-out is defined in terms of "access" to video service,⁴ and "access" is defined as the "*capability* of providing service at the household address . . . *regardless of whether any customer has ordered service*. . . ."⁵ By DIVCA's terms, video subscribership is irrelevant to build-out.

In addition, such information is highly sensitive. Verizon began offering video service in its state franchise area just months ago following issuance of its franchise on March 8, 2007. Granular subscribership data by census tract from such a new market entrant is highly competitively sensitive, which is part of the reason DIVCA did not require such information. Moreover, as pointed out by several parties, DIVCA recognizes that the path to greater availability of advanced services is through competition, not reporting. DIVCA already requires reporting of broadband services subscribership data, which is more than adequate to fulfill DIVCA's goal of complementing efforts to close the digital divide. Thus, video subscribership reporting by census tract⁶ exceeds DIVCA's requirements, adds nothing to the Commission's enforcement of its provisions, and therefore should not be required.⁷

In addition, DRA's request for "pricing information for video service"⁸ has no relevance to any issue either presented by DIVCA or within the Commission's

⁴ § 5890(e).

⁵ § 5890(j)(4)(emphasis added).

⁶ DRA fails to mention that aggregate video subscribership data will already be provided in conjunction with providing free service to community centers at the rate of one free service per 10,000 customers. See General Order 169, § VII.D(2). Such reporting will be more than adequate for purposes of DIVCA enforcement.

⁷ See § 5840(a) (Commission may not "otherwise impose any requirement on any holder of a state franchise except as expressly provided in this division.")(emphasis added).

⁸ DRA at 4.

jurisdiction. Indeed, DIVCA makes clear that it “*shall not* be construed as granting authority to the commission to regulate the rates, terms and conditions of video service, except as explicitly set forth in this division.”⁹ Moreover, requiring pricing information from only a few market participants would be anti-competitive and directly contrary to DIVCA’s pro-competition and level playing field mandate.¹⁰ Therefore, any reporting requirement regarding video pricing would exceed the limits of DIVCA and be unlawful.

B. Diversity-Related Information Exceeds the Scope of DIVCA

The Greenlining Institute’s requests for reporting of diversity-related data with respect to employment, contracting, and content clearly exceed the scope of DIVCA and were rejected in the earlier phase of this proceeding for that reason.¹¹ Such issues are simply not part of DIVCA. Greenlining’s further request should be rejected.

C. Enforcement Processes are Sufficiently Detailed

The California Cable and Telephone Association (CCTA) acknowledges, correctly, that the Commission “has all the information necessary to evaluate compliance with build-out requirements and to assess infrastructure investment, including network information files annually on a census track (sic) basis.”¹² However, CCTA goes beyond the Scoping Memo and seeks to re-plow old ground by alleging, incorrectly, that the Commission must establish processes to address enforcement of DIVCA provisions, including build-out and cross-

⁹ § 5820(c).

¹⁰ § 5810((2)(A).

¹¹ See, e.g., D.07-03-014 at 3-4 and footnote 8 (“We shall not adopt proposals that fall outside of the scope of this statutory authority.”).

¹² CCTA at 3.

subsidization requirements.¹³ The Commission has already responded to prior comments in this area in D.07-03-014, devoting over twenty pages to a detailed discussion of its “specific enforcement strategy”¹⁴ and “tailor[ed] ... reporting requirements” on all aspects of DIVCA under its jurisdiction, including build-out and cross-subsidization. CCTA’s comments on this point have already been addressed and are therefore moot.

D. Specific Technology Detail Is Not Needed

Those parties who submitted comments as the Joint Consumers¹⁵ place great emphasis on seeking information regarding the “*specific* broadband *and* video service technology,” and the speed that each is able to deliver, to “allow the determination of whether the various technologies offered provide ‘similar two-way broadband Internet accessibility and similar video programming.’ ”¹⁶ Joint Consumers’ proposal goes beyond the requirements of DIVCA, is unnecessary, and is of no practical use to the Commission.

DIVCA permits video franchise holders to use *any* technology other than “direct-to-home satellite service” to provide video access.¹⁷ It does not require reporting of the specific technology used, or the specific capabilities or functionality of those technologies. It also does not mandate that broadband speeds and functionality be similar throughout all areas of the state. Instead, DIVCA requires reporting on the number of households offered video access; if more than one technology is used, it also requires that such access provide “similar two-way broadband internet accessibility and similar video

¹³ CCTA at 7, 8.

¹⁴ D.07-03-014 at 178; see also pp. 176-197.

¹⁵ California Community Technology Group, Latino Issues Forum, and the Utility Reform Network.

¹⁶ Joint Consumers at 5 (emphasis in original).

¹⁷ § 5890(j)(4)

programming.” Because only those technologies with “similar” internet accessibility and video programming are to be reported, further detail by type of technology is unnecessary to comply with DIVCA. More detail is also of no practical value for the Commission to monitor compliance with DIVCA’s build-out requirements.

E. Conclusion

For the reasons set forth above and in Verizon’s opening comments, no additional rules on issues identified in the Scoping Memo are required.¹⁸

Dated: June 15, 2007

Respectfully submitted,

By: 
ELAINE M. DUNCAN

Attorney for Verizon California Inc.
711 Van Ness Avenue, Suite 300
Tel: 415-474-0468
Fax: 415-474-6546
San Francisco, CA 94102
E-mail: Elaine.duncan@verizon.com

¹⁸ Verizon has taken no position on rules with respect to build-out requirement for holders with fewer than one million telephone customers.

CERTIFICATE OF SERVICE

I hereby certify that: I am over the age of eighteen years and not a party to the within entitled action; my business address is 711 Van Ness Ave., Ste. 300, San Francisco, CA 94102; I have this day served a copy of the foregoing:

**REPLY COMMENTS OF VERIZON ON ISSUES SET FORTH IN PHASE II
SCOPING MEMO DATED MAY 7, 2007**

by electronic mail to those parties on the service list shown below who have supplied an e-mail address, and by U.S. mail to all other parties on the service list.

I declare under penalty of perjury that the foregoing is true and correct.
Executed this 15th day of June, 2007, at Thousand Oaks, California.

/s/Jacque Lopez
JACQUE LOPEZ

Service List:
Rulemaking 06-10-005

CALIFORNIA PUBLIC UTILITIES COMMISSION

Service Lists

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Filer: CPUC - CABLE TELEVISION

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Appearance

WILLIAM H. WEBER
ATTORNEY AT LAW
CBeyond COMMUNICATIONS
320 INTERSTATE NORTH PARKWAY
ATLANTA, GA 30339

ANN JOHNSON
VERIZON
HQE02F61
600 HIDDEN RIDGE
IRVING, TX 75038

DAVID C. RODRIGUEZ
STRATEGIC COUNSEL
523 WEST SIXTH STREET, SUITE 1128
LOS ANGELES, CA 90014

MAGGLE HEALY
CITY OF REDONDO BEACH
415 DIAMOND STREET
REDONDO BEACH, CA 90277

GERALD R. MILLER
CITY OF LONG BEACH
333 WEST OCEAN BLVD.
LONG BEACH, CA 90802

TRACEY L. HAUSE
ADMINISTRATIVE SERVICES DIRECTOR
CITY OF ARCADIA
240 W. HUNTINGTON DRIVE
ARCADIA, CA 91007

CYNTHIA J. KURTZ
CITY MANAGER
CITY OF PASADENA
117 E. COLORADO BLVD., 6TH FLOOR
PASADENA, CA 91105

ROB WISHNER
CITY OF WALNUT
21201 LA PUENTE ROAD
WALNUT, CA 91789

ESTHER NORTHRUP
COX CALIFORNIA TELCOM, LLC
5159 FEDERAL BLVD.

BILL NUSBAUM
THE UTILITY REFORM NETWORK
711 VAN NESS AVENUE, SUITE 350

SAN DIEGO, CA 92105

SAN FRANCISCO, CA 94102

ELAINE M. DUNCAN
ATTORNEY AT LAW
VERIZON
711 VAN NESS AVENUE, SUITE 300
SAN FRANCISCO, CA 94102

REGINA COSTA
THE UTILITY REFORM NETWORK
711 VAN NESS AVENUE, SUITE 350
SAN FRANCISCO, CA 94102

BARRY FRASER
CIYT OF SAN FRANCISCO
875 STEVENSON STREET, 5TH FLOOR
SAN FRANCISCO, CA 94103

WILLIAM L. LOWERY
MILLER & VAN EATON, LLP
400 MONTGOMERY ST., SUITE 501
SAN FRANCISCO, CA 94103

WILLIAM L. LOWERY
MILLER & VAN EATON, LLP
580 CALIFORNIA STREET, SUITE 1600
SAN FRANCISCO, CA 94104

DAVID J. MILLER
ATTORNEY AT LAW
AT&T CALIFORNIA
525 MARKET STREET, ROOM 2018
SAN FRANCISCO, CA 94105

DAVID J. MILLER
ATTORNEY AT LAW
AT&T CALIFORNIA
525 MARKET STREET, ROOM 2018
SAN FRANCISCO, CA 94105

FASSIL FENIKILE
AT&T CALIFORNIA
525 MARKET STREET, ROOM 1925
SAN FRANCISCO, CA 94105

SYREETA GIBBS
AT&T CALIFORNIA
525 MARKET STREET, 19TH FLOOR
SAN FRANCISCO, CA 94105

TOM SELHORST
AT&T CALIFORNIA
525 MARKET STREET, 2023
SAN FRANCISCO, CA 94105

ENRIQUE GALLARDO
LATINO ISSUES FORUM
160 PINE STREET, SUITE 700
SAN FRANCISCO, CA 94111

MARK P. SCHREIBER
ATTORNEY AT LAW
COOPER, WHITE & COOPER, LLP
201 CALIFORNIA STREET, 17TH FLOOR
SAN FRANCISCO, CA 94111

PATRICK M. ROSVALL
ATTORNEY AT LAW
COOPER, WHITE & COOPER LLP
201 CALIFORNIA STREET, 17TH FLOOR
SAN FRANCISCO, CA 94111

SEAN P. BEATTY
ATTORNEY AT LAW
COOPER, WHITE & COOPER, LLP
201 CALIFORNIA ST., 17TH FLOOR
SAN FRANCISCO, CA 94111

ALLEN S. HAMMOND, IV
PROFESSOR OF LAW
SANTA CLARA UNIVERSITY SCHOOL OF LAW
500 EL CAMINO REAL
SANTA CLARA, CA 94305

ALEXIS K. WODTKE
STAFF ATTORNEY
CONSUMER FEDERATION OF CALIFORNIA
520 S. EL CAMINO REAL, STE. 340
SAN MATEO, CA 94402

ANITA C. TAFF-RICE
ATTORNEY AT LAW
1547 PALOS VERDES MALL, SUITE 298
WALNUT CREEK, CA 94597

DOUGLAS GARRETT
COX COMMUNICATIONS
2200 POWELL STREET, STE. 1035
EMERYVILLE, CA 94608

GLENN SEMOW
DIRECTOR STATE REGULATORY & LEGAL AFFAIR
CALIFORNIA CABLE & TELECOMMUNICATIONS
360 22ND STREET, NO. 750
OAKLAND, CA 94612

IZETTA C.R. JACKSON
OFFICE OF THE CITY ATTORNEY
CITY OF OAKLAND
1 FRANK H. OGAWA PLAZA, 10TH FLR.
OAKLAND, CA 94612

JEFFREY SINSHEIMER
CALIFORNIA CABLE & TELECOMMUNICATIONS
360 22ND STREET, 750
OAKLAND, CA 94612

LESLA LEHTONEN
VP LEGAL & REGULATORY AFFAIRS
CALIFORNIA CABLE TELEVISION ASSOCIATION
360 22ND STREET, NO. 750
OAKLAND, CA 94612

MARIA POLITZER
LEGAL DEPARTMENT ASSOCIATE
CALIFORNIA CABLE TELEVISION ASSOCIATION
360 22ND STREET, NO. 750
OAKLAND, CA 94612

MARK RUTLEDGE
TELECOMMUNICATIONS FELLOW
THE GREENLINING INSTITUTE
1918 UNIVERSITY AVENUE, SECOND FLR.
BERKELEY, CA 94704

PHILIP KAMLARZ
CITY OF BERKELEY
2180 MILVIA STREET
BERKELEY, CA 94704

ROBERT GNAIZDA
POLICY DIRECTOR/GENERAL COUNSEL
THE GREENLINING INSTITUTE
1918 UNIVERSITY AVENUE, SECOND FLOOR
BERKELEY, CA 94704

THALIA N.C. GONZALEZ
LEGAL COUNSEL
THE GREENLINING INSTITUTE
1918 UNIVERSITY AVE., 2ND FLOOR
BERKELEY, CA 94704

WILLIAM HUGHES
ASSISTANT CITY ATTORNEY
CITY OF SAN JOSE
16TH FLOOR
200 EAST SANTA CLARA STREET
SAN JOSE, CA 95113-1900

GREG R. GIERCZAK
EXECUTIVE DIRECTOR
SURE WEST TELEPHONE

PATRICK WHITNELL
LEAGUE OF CALIFORNIA CITIES
1400 K STREET

PO BOX 969
200 VERNON STREET
ROSEVILLE, CA 95678

SACRAMENTO, CA 95814

MARIE C. MALLIETT
THE COMMUNICATIONS WORKERS OF AMERICA
2870 GATEWAY OAKS DRIVE, SUITE 100
SACRAMENTO, CA 95833-3509

Information Only

KEVIN SAVILLE
ASSOCIATE GENERAL COUNSEL
CITIZENS/FRONTIER COMMUNICATIONS
2378 WILSHIRE BLVD.
MOUND, MN 55364

GREGORY T. DIAMOND
7901 LOWRY BLVD.
DENVER, CO 80230

ALOA STEVENS
DIRECTOR, GOVERNMENT&EXTERNAL AFFAIRS
FRONTIER COMMUNICATIONS
PO BOX 708970
SANDY, UT 84070-8970

KEN SIMMONS
ACTING GENERAL MANAGER
INFORMATION TECHNOLOGY AGENCY
CITY HALL EAST, ROOM 1400
200 N. MAIN STREET
LOS ANGELES, CA 90012

LONNIE ELDRIDGE
DEPUTY CITY ATTORNEY
CITY ATTORNEY'S OFFICE
CITY HALL EAST, SUITE 700
200 N. MAIN STREET
LOS ANGELES, CA 90012

RICHARD CHABRAN
CALIFORNIA COMMUNITY TECHNOLOGY POLICY
1000 ALAMEDA STREET, SUITE 240
LOS ANGELES, CA 90012

ROY MORALES
CHIEF LEGISLATIVE ANALYST
CIYT OF LOS ANGELES
CITY HALL
200 N. SPRING STREET, 2ND FLOOR
LOS ANGELES, CA 90012

WILLIAM IMPERIAL
TELECOMMUNICATIONS REG. OFFICER
INFORMATION TECHNOLOGY AGENCY
CITY HALL EAST, ROOM 1255
200 N. MAIN STREET
LOS ANGELES, CA 90012

GREG FUENTES
11041 SANTA MONICA BLVD., NO.629
LOS ANGELES, CA 90025

JONATHAN L. KRAMER
ATTORNEY AT LAW
KRAMER TELECOM LAW FIRM
2001 S. BARRINGTON AVE., SUITE 306
LOS ANGELES, CA 90025

MICHAEL J. FRIEDMAN
VICE PRESIDENT
TELECOMMUNICATIONS MANAGEMENT CORP.

ANDRES F. IRLANDO
VICE PRESIDENT
VERIZON CALIFORNIA, INC.

5757 WILSHIRE BLVD., SUITE 635
LOS ANGELES, CA 90036

112 LAKEVIEW CANYON ROAD
THOUSAND OAKS, CA 91362

STEVEN LASTOMIRSKY
DEPUTY CITY ATTORNEY
CITY OF SAN DIEGO
1200 THIRD AVENUE, 11TH FLOOR
SAN DIEGO, CA 92101

SUSAN WILSON
DEPUTY CITY ATTORNEY
RIVERSIDE CITY ATTORNEY'S OFFICE
3900 MAIN STREET, 5TH FLOOR
RIVERSIDE, CA 92522

AARON C. HARP
OFFICE OF THE CITY ATTORNEY
CITY OF NEWPORT BEACH
3300 NEWPORT BLVD
NEWPORT BEACH, CA 92658-8915

CHRISTINE MAILLOUX
ATTORNEY AT LAW
THE UTILITY REFORM NETWORK
711 VAN NESS AVENUE, SUITE 350
SAN FRANCISCO, CA 94102

WILLIAM K. SANDERS
DEPUTY CITY ATTORNEY
OFFICE OF THE CITY ATTORNEY
1 DR. CARLTON B. GOODLETT PLACE, ROOM 234
SAN FRANCISCO, CA 94102-4682

MALCOLM YEUNG
STAFF ATTORNEY
ASIAN LAW CAUCUS
939 MARKET ST., SUITE 201
SAN FRANCISCO, CA 94103

RANDLOPH W. DEUTSCH
SIDLEY AUSTIN LLP
555 CALIFORNIA STREET, SUITE 2000
SAN FRANCISCO, CA 94104

GREG STEPHANICICH
RICHARDS, WATSON & GERSHON
44 MONTGOMERY STREET, SUITE 3800
SAN FRANCISCO, CA 94104-4811

RHONDA J. JOHNSON
VP-REGULATORY AFFAIRS
AT&T CALIFORNIA
525 MARKET STREET, ROOM 1923
SAN FRANCISCO, CA 94105

MARGARET L. TOBIAS
TOBIAS LAW OFFICE
460 PENNSYLVANIA AVENUE
SAN FRANCISCO, CA 94107

PETER A. CASCIATO
A PROFESSIONAL CORPORATION
355 BRYANT STREET, SUITE 410
SAN FRANCISCO, CA 94107

NOEL GIELEGHEM
COOPER, WHITE & COOPER LLP
201 CALIFORNIA ST. 17TH FLOOR
SAN FRANCISCO, CA 94111

JOSE E. GUZMAN, JR.
NOSSAMAN GUTHNER KNOX & ELLIOTT LLP
50 CALIFORNIA STREET, 34TH FLOOR
SAN FRANCISCO, CA 94111-4799

KATIE NELSON
DAVIS WRIGHT TREMAINE, LLP
505 MONTGOMERY STREET, SUITE 800
SAN FRANCISCO, CA 94111-6533

GRANT GUERRA
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 7442
SAN FRANCISCO, CA 94120-7442

GRANT KOLLING
SENIOR ASSISTANT CITY ATTORNEY
CITY OF PALO ALTO
250 HAMILTON AVENUE, 8TH FLOOR
PALO ALTO, CA 94301

DAVID HANKIN
VP, GOVERNMENT AFFAIRS
RCN CORPORATION
1400 FASHION ISLAND BLVD., SUITE 100
SAN MATEO, CA 94404

MARK T. BOEHME
ASSISTANT CITY ATTORNEY
CITY OF CONCORD
1950 PARKSIDE DRIVE
CONCORD, CA 94510

PETER DRAGOVICH
ASSISTANT TO THE CITY MANAGER
CITY OF CONCORD
1950 PARKSIDE DRIVE, MS 01/A
CONCORD, CA 94519

BOBAK ROSHAN
LEGAL ASSOCIATE
THE GREENLINING INSTITUTE
1918 UNIVERSITY STREET, 2ND FLOOR
BERKELEY, CA 94704

STEPHANIE CHEN
LEGAL ASSOCIATE
THE GREENLINING INSTITUTE
1918 UNIVERSITY STREET, 2ND FLOOR
BERKELEY, CA 94704

SCOTT MCKOWN
C/O CONT OF MARIN ISTD
MARIN TELECOMMUNICATION AGENCY
371 BEL MARIN KEYS BOULEVARD
NOVATO, CA 94941

BARRY F. MCCARTHY, ESQ.
ATTORNEY AT LAW
MCCARTHY & BARRY LLP
100 PARK CENTER PLAZA, SUITE 501
SAN JOSE, CA 95113

TIM HOLDEN
SIERRA NEVADA COMMUNICATIONS
PO BOX 281
STANDARD, CA 95373

CHARLES BORN
MANAGER, GOVERNMENT & EXTERNAL AFFAIRS
FRONTIER COMMUNICATIONS OF CALIFORNIA
9260 E. STOCKTON BLVD.
ELK GROVE, CA 95624

JOE CHICOINE
MANAGER, STATE GOVERNMENT AFFAIRS
FRONTIER COMMUNICATIONS
PO BOX 340
ELK GROVE, CA 95759

KELLY E. BOYD
NOSSAMAN, GUTHNER, KNOX AND ELLIOTT
915 L STREET, SUITE 1000
SACRAMENTO, CA 95814

ROBERT A. RYAN
COUNTY COUNSEL
COUNTY OF SACRAMENTO
700 H STREET, SUITE 2650
SACRAMENTO, CA 95814

SUE BUSKE
THE BUSKE GROUP
3001 J STREET, SUITE 201

SACRAMENTO, CA 95816

State Service

ALIK LEE
CALIF PUBLIC UTILITIES COMMISSION
TELECOMMUNICATIONS & CONSUMER ISSUES BRA
ROOM 4101
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

ANNE NEVILLE
CALIF PUBLIC UTILITIES COMMISSION
CARRIER BRANCH
AREA 3-E
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

APRIL MULQUEEN
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF STRATEGIC PLANNING
ROOM 5119
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

JANE WHANG
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 5029
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

JENNIE CHANDRA
CALIF PUBLIC UTILITIES COMMISSION
EXECUTIVE DIVISION
ROOM 5141
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

JOSEPH WANZALA
CALIF PUBLIC UTILITIES COMMISSION
ELECTRICITY RESOURCES & PRICING BRANCH
ROOM 4101
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

MICHAEL OCHOA
CALIF PUBLIC UTILITIES COMMISSION
TELECOMMUNICATIONS & CONSUMER ISSUES BRA
ROOM 4102
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

ROBERT LEHMAN
CALIF PUBLIC UTILITIES COMMISSION
TELECOMMUNICATIONS & CONSUMER ISSUES BRA
ROOM 4102
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

SINDY J. YUN
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 4300
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

STEVEN KOTZ
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF ADMINISTRATIVE LAW JUDGES
ROOM 2251
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

TIMOTHY J. SULLIVAN
CALIF PUBLIC UTILITIES COMMISSION
EXECUTIVE DIVISION
ROOM 5212
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

WILLIAM JOHNSTON
CALIF PUBLIC UTILITIES COMMISSION
PUBLIC & DECISION ANALYSIS BRANCH
AREA 3-F
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

DELANEY HUNTER
CALIF PUBLIC UTILITIES COMMISSION
EXECUTIVE DIVISION

EDWARD RANDOLPH
ASM LEVINE'S OFFICE
ASSEMBLY COMMITTEE/UTILITIES AND COMMERC

770 L STREET, SUITE 1050
SACRAMENTO, CA 95814

STATE CAPITOL ROOM 5136
SACRAMENTO, CA 95814

RANDY CHINN
SENATE ENERGY UTILITIES & COMMUNICATIONS
STATE CAPITOL, ROOM 4040
SACRAMENTO, CA 95814

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